

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
www.flmb.uscourts.gov

In re:

EIHAB H. TAWFIK, M.D., P.A.,

Debtor.

CASE NO.: 3:18-bk-01164-JAF
CHAPTER 11

Emergency Hearing Requested on or before
Friday, April 13, 2018

CERTIFICATION OF NECESSITY OF REQUEST FOR EMERGENCY HEARING

I HEREBY CERTIFY, as a member of the Bar of the Court, that I have carefully examined the matter under consideration and to the best of my knowledge, information and belief formed after reasonable inquiry, all allegations are well grounded in fact and all contentions are warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law can be made, that the matter under consideration is not interposed for any improper purpose, such as to harass, to cause delay, or to increase the cost of litigation, and there is just cause to request a consideration of the following pleadings on an emergency preliminary basis:

**DEBTOR'S EMERGENCY MOTION FOR AUTHORITY
TO PAY PREPETITION WAGE CLAIMS
AND REQUEST FOR EMERGENCY PRELIMINARY HEARING
(Doc. No. 10)**

**DEBTOR'S EMERGENCY MOTION FOR AUTHORITY
TO PAY OFFICER AFFILIATE SALARIES
AND REQUEST FOR EMERGENCY PRELIMINARY HEARING
(Doc. No. 11)**

**DEBTOR'S EMERGENCY MOTION
FOR AUTHORITY TO USE CASH COLLATERAL AND
REQUEST FOR EMERGENCY PRELIMINARY HEARING
(Doc. No. 9)**

I CERTIFY FURTHER that there is a true necessity for an emergency preliminary hearing on the Motion because the relief requested will help ensure Debtor's orderly entry into Chapter 11 and will avoid many of the possible disruptions and distractions that could divert the Debtor's attention from more pressing matters during the initial days of the Chapter 11 case. Moreover, emergency relief is requested in order to ensure that Debtor will meet its payroll obligations on April 13, 2018.

I CERTIFY FURTHER that the necessity of this emergency preliminary hearing has not been caused by a lack of due diligence on my part, but has been brought about only by circumstances beyond my control or that of my client. I further certify that this motion is filed with full understanding of F.R.B.P. 9011, and the consequences of noncompliance with same.

RESPECTFULLY SUBMITTED this 12th day of April 2018.

/s/ Justin M. Luna, Esq.

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_____ /

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of **CERTIFICATION OF REQUEST FOR EMERGENCY PRELIMINARY HEARING** has been furnished electronically and by U.S. First Class mail, postage prepaid, to: **Eihab H. Tawfik, M.D., P.A.**, c/o Eihab H. Tawfik, 7394 West Gulf to Lake Highway, Crystal River, Florida 34429; Central Bank, c/o Megan W. Murray, Esq., 101 E. Kennedy Blvd., Suite 1700, Tampa, Florida 33602; the twenty largest unsecured creditors as shown on the matrix attached hereto, and the U.S. Trustee, 400 W. Washington Street, Suite 1100, Orlando, Florida 32801, this 12th day of April 2018.

/s/ Justin M. Luna

Justin M. Luna, Esq.